

Streams/Rivers Interim Value to Protect Recreation Uses

As discussed in our responsive comments, EPA supports the Division's proposal to adopt a benthic chlorophyll criterion of 150 mg/m² as a criterion to protect recreation uses of rivers and streams in Colorado.¹ We believe the Division's proposed interim value is well supported and can be refined as new data and information become available.

Aesthetic Considerations

In their responsive comments, Metro Wastewater Reclamation District (MWRD) expressed concern that adopting the proposed interim value would be inconsistent with how recreation uses are defined. MWRD's comments included the following:

“The Metro District agrees that aesthetics play a vital role in the recreational experience in Colorado and that the visual appearance of a stream can, to some extent, influence the recreational experience that occurs on rivers and streams in Colorado. The District also understands the need to protect the recreation use. However, the proposed criteria should be consistent with the existing recreation classification set forth in section 31.13(1)(a) which is based on primary contact, not aesthetics. Specifically, the primary contact use is risk-based to protect human health.” MWRD RPHS, page 16.

We disagree with MWRD. Our view is that interim values adopted to protect Colorado's recreation classifications are appropriately based on describing water quality conditions that support those uses. Regarding recreation, the appropriate considerations go beyond just human health considerations related to bacterial contamination. For example, the Commission has adopted table value standards for pH and dissolved oxygen to support recreation uses. These values clearly are not related to bacterial contamination. If periphyton growth in a river or stream discourages recreation because of its appearance, or because the rocks are too slippery, it is appropriate to adopt interim values based on those concerns so that recreation uses can be supported.

We also note that the slimy/slippery aspect is more than just aesthetics, it can also be a safety issue. Montana's user perception survey² captured this concern, and a variety of other user concerns in written comments received from survey respondents:

- 33% stated that fishing was affected (e.g., snags lures, etc.)
- 23% indicated wading impacts (e.g., slippery, dangerous, and would wrap around legs)

¹ See pages 15 - 17 of Enclosure 1 in our responsive comments.

² Suplee et al. 2009. How green is too green? Public opinion of what constitutes undesirable algal levels in streams. Journal of the American Water Resources Association 43: 123-140.

- 11% cited swimming interference (e.g., looks unsuitable and would get entangled)
- 11% stated strictly aesthetic reasons
- 2% stated boating interference (e.g., entangles paddles)
- 20% had comments not readily classified into the aforementioned groups